

Record/FILE ON DEMAND

U.S.P.S. PRIORITY EXPRESS TRACKING No. EI 259 217 714 US

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Nelson L. Bruce,

Plaintiff(s),

vs.

REV FEDERAL CREDIT UNION, TRANS
UNION, LLC, et al.

Defendant(s).

CASE NO.: 2:22-cv-01292-BHH-MGB

**PLAINTIFF'S MOTION FOR AN
EXTENSION OF TIME TO
SERVE AND ALLOW NON-PARTIES
A REASONABLE AMOUNT OF TIME
TO RESPOND TO AND COMPLY
WITH SUBPOENAS, MOTION FOR
EXTENSION OF TIME FOR
DISCOVERY, AND MOTION FOR
ADDITIONAL INTERROGATORIES TO
BE SERVED ON AND ANSWERED BY
TRANS UNION, LLC**

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Comes now plaintiff, Nelson L. Bruce with his motion for an extension of time to allow the Non-parties time to be served with subpoenas and for non-parties to which subpoenas was granted against on 12-1-2023 a reasonable amount of time to respond to plaintiff's subpoenas and for Plaintiff to file a motion to compel discovery should the parties fail to comply with subpoenas.

BACKGROUND

On or about 11-30-2023, Plaintiff filed a motion requesting for subpoenas to be issued to multiple non-parties (See...ECF No. 95). On or about 12-1-2023, this court granted plaintiff's Motion for Issuance of Subpoena and directed the Clerk of Court to issue the subpoenas which the clerk mailed out the subpoenas to plaintiff (See...ECF No.'s 96 & 97). Plaintiff received the subpoenas by mail on 12-4-2023 at the end of the day. Plaintiff prepared the subpoenas on 12-4-2023 to be mailed out and served on the non-parties. One party has been served as of 12-7-2023, the other party has not been served because the contact information provided by Trans Union in

discovery was outdated as it was not the address of Teleperformance nor its counsel. Plaintiff received a call today (12-7-2023 at 3:07 p.m. from 1-212-808-4511) related to service on Teleperformance. The party at that location who receives mail for the offices has informed the plaintiff that there is no business by the name of Teleperformance/Intelenet at the location of 101 Park Avenue, New York, NY 10178 which was provided by TransUnion. Plaintiff is requesting an extension of time get correct information to serve non-parties and to serve all non-parties and to give the non-parties the required 14 days to comply and so plaintiff has a reasonable amount of time to review the discovery produced by the non-parties and address any issues of a failure to comply. Plaintiff is also requesting an extension of time because Trans Union has supplemented their first discovery responses sent to plaintiff twice, once on or about November 11, 2023 and once on November 22, 2023 (See...Exhibit B-1) which is not enough time to review over 177 pages of discovery plus answers and responses received and address additional information based on the discovery received. The timeframe remaining for discovery expires on 12-11-2023.

Plaintiff further requests that he be allowed to serve an additional 15 interrogatories as plaintiff has reached the 25 interrogator limit but has additional interrogatories based on the supplemented discovery received from Trans Union since Trans Union has supplemented their responses twice in one month. Plaintiff will need to address the new discovery received once fully reviewed. This court should grant plaintiff an additional extension of time in the amount of 45 days from the original due date to receive a response back from the non-parties who the subpoenas were issued against and so plaintiff has enough time to review the supplemented discovery received from Trans Union and address any additional discovery needed, some of which Trans Union is already in possession of as they have informed plaintiff that they will not respond to interrogatories that are over the limit of 25. This motion is not presented in bad faith nor to delay time and will not prejudice the opposing party but for plaintiff to have enough time to address the recently received discovery from Trans Unions

and to receive discovery from non-parties and address other non-parties. Mediation should proceed as scheduled as the parties have already been in communication and have requested scheduling of mediation with a mediator for the 27th of December, 2023.

CONCLUSION

For the following reasons, Plaintiff prays that the court grants Plaintiff's motion for a 45 day extension of time from the 12-11-2023 for discovery. Date this 7th day of **December, 2023**.

RESPECTFULLY PRESENTED,

"Without Prejudice"



Nelson L. Bruce, Propria Persona, Sui Juris
"All Natural Rights Explicitly Reserved and Retained"
c/o P.O. Box 3345, Summerville, South Carolina 29484
Phone: 843-437-7901
Email: leonbruce81@yahoo.com